Bruce A. Schoenberg Schrader & Schoenberg, LLP 711 Third Avenue, Suite 1505 New York, New York 10017 (212) 986-4888 Attorneys for Defendants

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

JET ONE GROUP, INC.,

Plaintiff,

Civil Action No. CV-08-3980

V.

HALCYON JET HOLDINGS, INC., HALCYON JETS, INC. ALFRED S. PALAGONIA a/k/a AL PALAGONIA, MITCHELL BLATT, MARK HADER, JAN E. CHASEN and GREGORY D. COHEN,

Defendants. :

TO: Steven G. Legum, Esq. 170 Old Country Road Mineola, New York 11501

SIR:

PLEASE TAKE NOTICE THAT upon the accompanying Memorandum of Law in Support of Motion for Sanctions and the Declaration of Bruce A. Schoenberg in Support of Motion for Sanctions dated November 21, 2008 and the exhibits thereto, defendants Halcyon Jet Holdings, Inc., Halcyon Jets, Inc., Alfred S. Palagonia a/k/a Al Palagonia, Mitchell Blatt, Mark Hader, Jan E. Chasen and Gregory Cohen ("Defendants") shall move before the United States District Court for the Eastern District of New York (Hon. Joanna Seybert, U.S.D.J.) at the Alphonse D'Amato Courthouse,

100 Federal Plaza, Central Islip, New York 11722-4449 on Tuesday, January 6, 2009 at 9:00 o'clock in the forenoon or as soon thereafter as counsel may be heard, for an Order: (1) imposing sanctions upon the plaintiff and its counsel, Steven Legum, Esq. pursuant to Federal Rule of Civil Procedure 11; and (b) granting defendants such other and further relief as may be deemed just and equitable.

PLEASE TAKE FURTHER NOTICE THAT pursuant to Local Rule 6.1(b) of the Eastern District of New York and the individual rules of the Honorable Joanna Seybert, U.S.D.J., opposition papers, if any, must be served and filed within ten (10) days hereof.

PLEASE TAKE FURTHER NOTICE THAT oral argument is hereby requested.

Dated: New York, New York December 15, 2008

> SCHRADER & SCHOENBERG, LLP 711 Third Avenue, Suite 1505 New York, New York 10017 (212) 986-4888

Attorneys for Defendants

By: Bruce A. Schoenberg